

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOLENE CALDWELL-KUSHNER,

Plaintiff,

v.

STANDARD INSURANCE
COMPANY

Defendant.

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C A NO. 4:17-cv-136

PLAINTIFFS' EXPERT WITNESS DESIGNATION

Plaintiff, Jolene Caldwell-Kushner, designates the following as persons from whom they may elicit expert testimony at the time of trial of this matter.

Dr. Luna Salazar
1649 Treasure Hills
Harlingen, Texas

Dr. Aldon Williams
5700 N. Expressway, Suite 101
Brownsville, Texas 78526

Dr. Eric Six
5505 S. Expressway 77 # 306
Harlingen, Texas 78550

Dr. Brewer
2501 Paredes Line
Brownsville, Texas 78526

Dr. Bettencourt
597 Sesame Drive
Harlingen, Texas 78550

Dr. Toro DeZarei
1200 Calle Milagros
Brownsville, Texas 78526

Dr. Salvatore
1713 Treasure Hills
Harlingen, Texas 78550

The above listed witnesses will testify as to the treatment of plaintiff's injuries, her present condition, the prognosis for recovery, ability to return to work and the reasonableness and necessity of the medical treatment in this matter.

Marc Whitehead
Marc Whitehead & Associates, Attorneys at Law
5300 Memorial Drive, Suite 725
Houston, Texas 77007
713-228-8888 tel
713-225-0940 fax

Mr. Whitehead may testify in the trial of this matter regarding the reasonable and necessary attorneys' fees incurred by any party in this action. Mr. Whitehead's resume is attached hereto as Exhibit "A"

II.

Plaintiffs reserve the right to illicit opinion testimony from any and all of the Defendant's expert witnesses.

III.

Plaintiffs reserve the right to supplement this designation further within the time limitations imposed by the Court and/or by any alterations of same by subsequent Court order and/or by agreement of the parties pursuant to the Federal Rules of Civil Procedure and/or the Federal Rules of Civil Evidence.

IV.

Plaintiffs reserve the right to withdraw the designation of any expert witness and to aver positively that such previously designated expert will not be called as an expert witness at trial and to re-designate same as a consulting expert, who cannot be called by opposing counsel.

V.

Plaintiffs reserve the right to call de-designated expert witnesses in rebuttal whose identities and testimony cannot reasonably be foreseen until Defendant has presented his evidence at trial.

VI.

Plaintiffs reserve the right to elicit any expert testimony and/or lay opinion testimony that would assist the jury in determining material issues of fact that would not violate the Federal Rules of Civil Procedure and/or the Federal Rules of Civil Evidence.

VII.

Plaintiffs designate and may call to testify as an adverse witness Defendant and any and all expert witnesses designated by Defendant.

Plaintiffs reserve all additional rights they may have with regard to expert witnesses and testimony under the Federal Rules of Civil Procedure, the Federal Rules of Civil Evidence, case law, and rulings of this Honorable Court.

Respectfully submitted,

MARC WHITEHEAD & ASSOCIATES,
ATTORNEYS AT LAW L.L.P.

By: /s/ Marc Whitehead
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ATTORNEY-IN-CHARGE
FOR PLAINTIFF,
JOLENE CALDWELL-KUSHNER

CERTIFICATE OF SERVICE

I certify a true copy of the foregoing document was sent to all counsel of record in this matter on this the 9th day of September, 2017 via U.S. Mail.

/s/ Marc Whitehead

Marc Whitehead